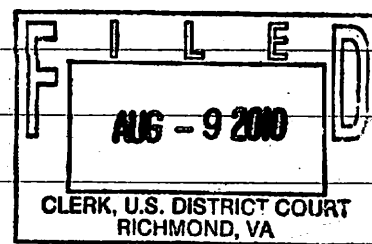


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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION



CHRISTOPHER LEE,
PLAINTIFF,

Civil Action

N.

No. 3:08-cv-99

PATRICK GURNEY, et al.,

(HANDWRITTEN COPY)

NOTICE OF EXPERT WITNESSES

PURSUANT TO FED. RULES OF CIVIL PROCEDURE 26(a)(2)(B) PLAINTIFF FILES THE FOLLOWING NOTICE OF REQUIRED DISCLOSURE AS IT PERTAINS TO EXPERT TESTIMONY.

THE FOLLOWING WITNESSES ARE NOT SPECIFICALLY EMPLOYED OR RETAINED TO PROVIDE EXPERT TESTIMONY, RATHER THEY ARE MEMBERS OF THE SUNNI MUSLIM COMMUNITY, WHOSE EXPERIENCE AND EDUCATION ARE REGARDED AS EXTENSIVE, AS REGARDS TO ISLAM, THE QUR'AN (OUR HOLY BOOK ON WHICH ISLAM IS BASED) AND THE UNDERSTANDING OF OUR (SUNNI MUSLIM) WAY OF LIFE. FURTHERMORE THE FOLLOWING WITNESSES ARE PROVIDING TESTIMONY ON A PURELY VOLUNTARY BASIS.

THE NAMES OF THE EXPERT WITNESSES ARE AS FOLLOWS:

(1) IMAM AMMAR AMONETTE

(CONT)

Position: Imam (spiritual leader) of
The Islamic Center of Virginia
(ICVA)

Testimony: Will pertain to religious tenets
that require congregational prayer
if 2 or more Muslims are present at
the time of prayer, as well as the
substantial blessings believed to be
lost by not adhering to that tenet.

Qualifications
Graduate of
Mecca University

He will testify to the fact that only
the leader of the prayer speaks and
there is no "conversation" during said
prayer. The Imam will testify as to the
general length of the prayer and the
peaceful nature and performance of
said prayer. The Imam will use the
Qur'an and Hadith (sayings of our Noble
Prophet) as well as rules of under-
standing in our Muslim way of life.

(2) Bro: ASGHAR GORAYA

Position: Director of MCSVA, Prison Outreach
Coordinator (Muslim Chaplain Services of
Virginia)

Testimony: Has testified in religious case
Couch v. Jabe, et al, Case No.
7:05-CV-00642

(CONT)

(CONT)

TESTIMONY; CASE No 7:05-CV-00642

will TESTIFY AS TO VOOO OPPRESSIVE PRACTICES CONCERNING MUSLIMS, AND REFUSAL TO GRANT BASIC RELIGIOUS RIGHTS AS TO DATE. HE will also TESTIFY THAT THE TIMES OF PRAYER MUST BE ADHERED TO REGARDLESS OF LOCATION.

(3) BRO. Carroll Malik

POSITION: MEMBER OF Muslim Chaplain Services of Virginia (MCSVA) PRISON OUTREACH SECTION.

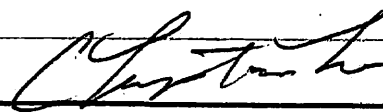
TESTIMONY: Will testify as TO CONDITIONS PEACEFUL MUSLIMS HAVE BEEN FORCED TO ENVOUE REGARDING PRACTICING RELIGIOUS TENETS THROUGHOUT THE VIRGINIA PRISON SYSTEM.

PURSUANT TO RULE 26(a)(2)(b)(i) THE PLAINTIFF CONTENDS THE WITNESSES STATEMENTS AND OPINIONS WILL BE IN SUPPORT OF WIDELY & GENERALLY KNOWN TENETS OF THE PRACTICE OF ISLAM, THE REASONS FOR THEM ARE TO REFUTE THE ARGUMENTS OF THE DEFENDANT'S CLAIMS THAT GROUP PRAYER IS A SECURITY RISK TO THE ORDERLY OPERATION OF THE INSTITUTION (WHICH IT IS NOT). THE EXHIBIT'S THAT WILL BE USED ARE THE HOLY QUR'AN, (THE MUSLIM HOLY BOOK), HADSEETH (SAYINGS & ACTIONS OF OUR PROPHET) AND FIQH (UNDERSTANDING

and MEANINGS AS PASSED DOWN BY THE LEARNED SCHOLARS OF ISLAM) I.E. RULE 26(a)(2)(b)(iii) THERE IS NO COMPENSATION AS PREVIOUSLY STATED THE QUALIFICATIONS HAVE BEEN STATED.

THE PLAINTIFF HAS INTENDED TO CALL AS A WITNESS THE REC. YARD OFFICERS BUT DUE TO TRANSFER FROM FACILITY WAS NOT ABLE TO PROCURE ANYMORE THAN LAST NAMES. AS TO WITNESSES (AS STATED ON ENCLOSED STATEMENT) THE PLAINTIFF RECEIVED RESPONSE FROM WITNESSES ON 7-29-2010, AS I AM INCARCERATED AND MY INSTITUTION (SUSSEX 1 PRISON) IS ON THE QUARTERLY LOCKDOWN, I AM CONFINED BY THE TIME CONSTRAINTS OF THE U.S. MAIL. THE PLAINTIFF HUMBLY REQUESTS IN LIEU OF AFFIDAVITS, THE HONORABLE COURT ACCEPTS ENCLOSED DOCUMENT AS PROOF OF WITNESSES' WILLINGNESS TO APPEAR AS EXPERT WITNESSES

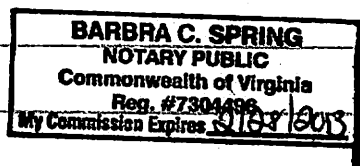
Respectfully Submitted,

 #1011188

CHRISTOPHER LEE #1011188

NOTARY

Subscribed and Sworn before me in my
Jurisdiction This 5th Day of August,
2010.



Barbara C. Spring
Notary Public

My Commission Expires 2/08/2013

I CHRISTOPHER LEE CERTIFY THE ABOVE NOTARY IS
NOT a Party to this ACTION.

Christopher Lee #1011188
CHRISTOPHER LEE #1011188

CERTIFICATE OF SERVICE

I CHRISTOPHER LEE, PLAINTIFF HEREBY CERTIFY THAT
ON THIS 5th Day of August, 2010 I
did mail via First Class Mail, Mail a true and complete
copy of the foregoing to the ATTORNEY GENERAL of Virginia,
ATTORNEY FOR THE DEFENDANTS AT 900 EAST MAIN STREET
RICHMOND, VA 23219.

Christopher Lee #1011188
CHRISTOPHER LEE #1011188